

**REMARKS**

Claims 1-20 are pending in the present application, with claims 3 and 12 having previously been withdrawn. Claims 1, 2, 4-11, and 13-20 stand rejected under 35 U.S.C. 103(a). Claims 1, 9, 10, and 16 have been amended with 1, 10 and 16 being the independent claims.

Reconsideration and allowance of claims 1, 2, 4-11, and 13-20 in view of the above amendments and the following remarks are respectfully requested.

**35 U.S.C. §103(a) (Claims 1, 2, 4-11, and 13-20; Hughes/Griffin):**

Applicant respectfully traverses this rejection because the combination of the cited references does not achieve claims 1, 2, 4-11, and 13-20, and proper motivation does not exist to combine the references.

First, the combination of the cited references does not achieve claims 1, 2, 4-11, and 13-20.

In regard to claim 1, the combination of the cited references does achieve, among other things, a keyboard for a mobile phone wherein a left set of one or more rows of input keys include a top row with a right-most key, a right set of one or more rows of input keys include a top row with a left-most key, and the right-most key of the top row of the left set of one or more rows of input keys being immediately adjacent to the left-most key of the top row of the right set of one or more rows of input keys, the left set of one or more rows of input keys arranged in one or more respective arcs having one or more respective arc centers located to the left of the centerline, and the right set of one or more rows of input keys arranged in one or more respective arcs having one

or more respective arc centers located to the right of the centerline; and a substantially rectangular numeric keypad including a plurality of phone number input keys that together are arranged in a rectangular configuration for entering phone numbers centered below, and distinct from, the left and right sets of one or more rows of input keys, wherein the left set of one or more rows of input keys and the right set of one or more rows of input keys are sandwiched between the display and the substantially rectangular numeric keypad.

In regard to claims 9, 10, and 16, the combination of the cited references does not achieve a keyboard for a mobile phone (nor accompanying method) where the keyboard is a thumb keyboard having a left set of one or more rows of input keys including a left-most input key and a right most input key and a right set of one or more rows of input keys including a left-most input key and a right most input key separated by a centerline, the left set of one or more rows are opposite the right set of one or more rows, and lines drawn through the left-most input key and the right most input key of opposite rows intersect the centerline, immediately adjacent the right-most input key of the left set of one or more rows of input keys and the left-most input key of the right set of one or more rows of input keys, to form a V shape; and a substantially rectangular numeric keypad including a plurality of phone number input keys that together are arranged in a rectangular configuration for entering phone numbers centered below, and distinct from, the left and right sets of one or more rows of input keys, wherein the left set of one or more rows of input keys and the right set of one or more rows of input keys are sandwiched between the display and the substantially rectangular numeric keypad.

In contrast, Hughes discloses a terminal for conducting remote purchase and bill payments. Hughes fails to disclose, among other things, a mobile phone, a thumb keypad, right and left sets of keys arranged in one or more arcs with respective arc centers to the left and to the right of a centerline. The keypad in Hughes also does not have right and left sets of keys where lines drawn through the left-most key and the right-most key of right/left sets intersect the centerline, immediately adjacent the left-most key of the right set and the right-most key of the left set, to form a V shape. Further, Hughes does not disclose a substantially rectangular numeric keypad centered below the left and right sets of one or more rows of input keys.

Griffin discloses a two-way paging device, not a mobile phone. The thumb keypad in Griffin does not have right and left sets of keys arranged in one or more arcs with respective arc centers to the left and to the right of a centerline. The thumb keypad in Griffin also does not have right and left sets of keys where lines drawn through the left-most key and the right-most key of right/left sets intersect the centerline, immediately adjacent the left-most key of the right set and the right-most key of the left set, to form a V shape. Griffin also fails to disclose a substantially rectangular numeric keypad including a plurality of phone number input keys that together are arranged in a rectangular configuration for entering phone numbers centered below, and distinct from, the left and right sets of one or more rows of input keys. Still further, Griffin fails to disclose the left set of one or more rows of input keys and the right set of one or more rows of input keys sandwiched between the display and the substantially rectangular numeric keypad.

Thus, the combination of Griffin with Hughes does not achieve claims 1, 2, 4-11, and 13-20.

Further, proper motivation does not exist to combine Griffin with Hughes.

Hughes is in the field of terminals for conducting remote purchase and bill payments, which is unrelated to mobile phones. Further, Hughes does not even disclose a thumb keypad. Thus, Hughes is not a proper base reference, and motivation would not exist to combine the features from Griffin (two-way paging device), which is in an unrelated field, with the features of Hughes (terminal for conducting remote purchase and bill payments).

Accordingly, Applicant respectfully submits that proper motivation does not exist to combine these references.

Therefore, Applicant respectfully requests that this rejection be withdrawn with respect to claims 1, 9, 10, and 16.

Because the dependent claims add further limitations to independent claims 1, 10, and 16, Applicant respectfully submits that the dependent claims are also in condition for allowance.

Therefore, reconsideration and allowance of claims 1, 2, 4-11, and 13-20 is respectfully requested.

**CONCLUSION**

For all the foregoing reasons, allowance of claims 1, 2, 4-11, and 13-20 is respectfully requested. Applicant respectfully does not acquiesce to any of the positions set forth in the Office Action of August 23, 2007. If necessary, Applicant requests, under the provisions of 37 CFR 1.136(a) to extend the period for filing a reply in the above-identified application and to charge the fees for a large entity under 37 CFR 1.17(a). The Director is authorized to charge any additional fee(s) or any underpayment of fee(s) or credit any overpayment(s) to Deposit Account No. 50-3001 of Kyocera Wireless Corp.

Respectfully Submitted,

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